

To: Rodriguez, Dante[Rodriguez.Dante@epa.gov]; Oman, Jack[Jack.Oman@bp.com]; John Batchelder[jbatchelder@envirosolve.com]; Dave Davis (drdavis@blm.gov)[drdavis@blm.gov]; Seter, David[Seter.David@epa.gov]
From: Jeryl Gardner
Sent: Wed 4/19/2017 6:00:04 PM
Subject: RE: APR 2017 Monthly Status Update - agenda/outline removed.txt

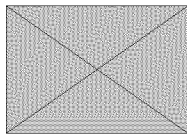
Jeryl's notes from today's call in green.

Let me know if you have any additions or corrections.

Jeryl R. Gardner, P.E., C.E.M.

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From: Rodriguez, Dante [mailto:Rodriguez.Dante@epa.gov]
Sent: Tuesday, April 4, 2017 11:22 AM
To: Oman, Jack <Jack.Oman@bp.com>; John Batchelder <jbatchelder@envirosolve.com>; Dave Davis (drdavis@blm.gov) <drdavis@blm.gov>; Jeryl Gardner <JGARDNER@ndep.nv.gov>; Seter, David <Seter.David@epa.gov>
Subject: APR 2017 Monthly Status Update - agenda/outline

ANACONDA SUPERFUND SITE

MONTHLY STATUS MEETING: ARC-EPA/NDEP/BLM

DATE: April 13, 2017

PARTICIPANTS: Dave Seter (EPA), Dante Rodriguez (EPA)

Jeryl Gardner (NDEP), Dave Davis (BLM)

Jack Oman (ARC), John Batchelder (Envirosolve)

Updates in blue.

Previous periods' information in gray.

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OU0. SITEWIDE:

•■■■■■■■■ NPL Listing.

○ ARC deferral proposal. BP met with EPA RA 1/26. NDEP, BLM and ARC met with EPA in SF 1/31.

- Removed listing package from HQ process for listing in March, can do listing in Sept if needed, need to make decision by end of June.
- Resolved covenants hurdle, discussing hurdles of groundwater, past costs (see below), tribal & community acceptance.
- 3/31 Draft deferral agreement received from NDEP, for EPA review. Dave has no specific update; probably mostly with legal team. Dave Davis has no update but has been participating on 3-way calls.
- **Tribes.** NDEP met with tribes, discussed how State will coordinate with them. Tribes informed state that they expected to be part of discussion by now, do not concur on delay of listing. State drafted consultation letter.

Angeles/Harry met with tribal chairs and councils, March 8th and 9th, informed of delay in listing, Greg and BLM attended too, also Jim Lawrence (Deputy Director of DCNR). YPT wanted to see deferral agreements by May 1. Is it "concurrence" or "acceptance" that is required. Tribe asked about EPA funding for their involvement if state-lead. Both tribes asked for communication protocol of contacting environmental coordinator first before contacting chairman. NDEP has sent letters to YPT but no response yet; Jack and Dave mentioned that Dietrick had recently sent a letter to ARC (probably same list as he shared with NDEP when they met in March. Jack said ARC had a call with YPT recently; no info on that; no call with WRPT yet, but coming.

- **YCAG.** Harry spoke with Peggy, Greg exchanged emails with her.
- Attorneys working on past costs.

- For 3/26 meeting/presentation, Dan Erbes will attend for BLM; Dave and Dante for EPA, and Harry calling in.

- **Public comments.** Eugenia working on responsiveness summary, incorporate staff input to outstanding questions, wrap it up then hold it. Dave review of specific proposed responses? (Listing is taking place in April instead of March). Anaconda is on the list for listing in September. Dave -No further action on the NPL comments until we know the path forward.

- **Community Involvement.**

- **CIP.** Draft, EPA team reviewed, Sarah hasn't shared with workgroup yet, awaiting direction re: deferral before moving along, on hold now.

- **SharePoint Site.** Issue regarding document ordering (not chronological), folder naming and structure, operability (crashes when try moving around from deep within file structure). TT provided document date data, CBI uploading to SP site, will enable chronological sorting. CBI revised structure so each folder is a "library" rather than having one big library with lots of folders, now enables smooth operation. When have time, Jeryl review folder nomenclature and organization and recommend any improvements. Jeryl –done, and relayed comments to David Cacciatore during call 4/18.

- **Other/General.**

- Dante sent out updated Sitewide gantt chart.

- Site wide planning discussion

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OU1. Groundwater:

- **Remedial Investigation.**

- **Background.** Dave sent Jack approval letter, Jeryl and DD hadn't received but don't need. We agreed to have plume stability evaluation come after the RI (see below).

- **RI Report.** B&C Greg Davis to complete, Jack has internal draft coming end of March, probably May timeframe to agencies, current schedule was for submittal April 3, need to revise. When Jack reviews, if he wants to run anything by Jeryl/Dave regarding structure and organization, that could save time. No update on RI Report from Jack, but still at least a month out before we see it.

- **Plume Stability.** YPT comments/white paper on background focus on plume

stability (movement), modeling effort. Dietrick has some additional information to add to white paper, show some more statistics they did.

- Jack received comments, team reviewing, working on ARC response, by end March. CBI to review tribe comments.

- Dave requested technical meeting in April/May/June to discuss with ARC, ARC agreed to meet and work it out, soliciting team availability. Dave will do presentation of proposal for plume stability, trends analysis. RTOC is 1st week May, not good time. Dave says May tech mtg still possible; Jack –will ask ARC team for dates in late May – early June. Jack will circulate some dates via email to all of us fairly soon. Dave might like to look at OU-4 data as well during that meeting. Dave Davis offered the BLM conference room for the meeting.

- To be dealt with post-RI, feed into FS, won't be part of RI report.

- **Feasibility Study.** Dave: awaiting direction of deferral before having ARC proceed.

- **Risk Assessment.** Don't wait for OU3 final approval, start OU1 HHRA workplan, have tech calls instead of detailed tech memos, same approach as OU7, ARC agreeable, approval of workplan would be key necessary agency approval before proceeding, don't need interim approvals. Jack will check with Alma on schedule. Dave: haven't decided yet how to proceed. Jeryl suggested (and Dave S agreed) having the risk assessors schedule a call to discuss next steps, general direction on both OU-1 and OU-3. Dave –somewhat slowed down due to deferral, etc. Jack will talk with Alma and Jamey and others to get potential dates; Dave will talk with Sophia and contractor support.

- **Bottled water.** Outreach to tribe needed before stop bottled water program. EPA will wait until RI final before make decision about tribe's bottled water. EPA received correspondence from ARC, haven't responded. Need to work with ARC to strategize dealing with well owners who are not connected to city water. ARC provided information about who is connected and who is not etc., ready to discuss. Jack will email Dave to get discussion started. (not done yet; Jack unsure whose court this is in after ARC sent latest domestic well status to EPA; Dave checking with EPA attorneys on this approach. Dave suggested a working group meeting to discuss strategies to remove bottled water program and make final connections to City water; Jack agreed as a next step to check our calendars; should attorneys participate in this discussion? Dave –better to have a clearer understanding first before involving attorneys. Dave has lost contractor support for bottled water program.) Ginny reported issue with bottled water logistics, bottles blown all around reservation, Ginny contact Jack, maybe arrange central drop-off point. Jack has not heard from Ginny yet; in her court.

OU3. Process Area:

- **Remedial Investigation.** Report reviewed, NDEP comments end of March, don't

anticipate significant comments, Hill and BLM comments received, Dave will review Hill comments end of March, awaiting YPT comments, working to get their grant in place. Dave no progress recently, but no one has any heartburn over lack of progress for now; deferral resolution/next steps is a higher priority.

- **Risk Assessment.**

- HHRA workplan. Workplan prepared, Dave will distribute, maybe end of April, no time now to address, looking at end May for submitting comments to ARC.

- **FS/PP/ROD.** Complete RI and HHRA, de-prioritize FS.

OU4a. Evaporation Ponds:

- **Data Results.** Schedule: DSR to agencies 3/15/17, data evaluation report by 4/24/17. ARC reviewing draft DSR by BC, to agencies hope end March, BC will be available for questions on DSR, data evaluation will be mostly by Coppers team with some BC, to ARC April, to agencies May or early June. Dave happy to have a discussion at the same time as OU-1 plume stability tech meeting.

OU7. Wabuska Drain:

- **Phase 1.** DSR and data evaluation submitted, discussed at 1/31 technical meeting, agreed Phase 1 data is sufficient and can proceed with HHRA/ERA, Dante sent approval letter.

- CBI submitted comments, YPT submitted comments, EPA incorporated and submitted, can followup with ARC and schedule discussion.

- Dante requested slides that AECOM presented at meeting, John to followup with Don, distribute to agencies.

- Add bullets to gantt chart to include comments on report, ARC responses, etc. Need to strategize the steps needed to get to RI and HHRA, then add to Gantt chart.

- Dante submitted comments to ARC, and suggested additional phase(s) should be planned.

- **YPT sampling.**

- SAP/QAPP.

- EPA QAMS approved.

- **Peer Review.** Reviewed by CBI, NDEP, BLM, ARC. Comments from ARC, QAMS reviewed. EPA to do letter response to ARC comment. Ginny thinks Ernest made some of the suggested changes, Dante will coordinate.

- **EPA lab/CLP.** Services being conducted, analytical and data validation.

- **Field work.** Schedule: field work complete 3/15/17. Dietrick mobilized February, CBI observed field work, completed field work in March. ARC questions about sampling strategy, did Dietrick provide? Dante recalls QAPP was also SAP. Jack/Jeryl requested copy of daily oversight reports, Dante will send when receive. Kevin working on field report, reported work going well, same level of detail as BC. We don't know when the YPT data will be available; check in with Dante to see if he knows anything.

- **HHRA/ERA Scoping.**

- ARC questioned how to include YPT sampling results in HHRA.

- EPA wants to proceed with HHRA for Phase 1 area, have Alma start, figure out process that works for her in terms of agency input, interaction, etc. ARC will meet with team and get back to us, can have a call to discuss.

- Team for HRA scoping, Cynthia Woo in SF office, or Mark Weisberg, Alma asked about using Cynthia, early decisions on exposure pathways is critical, Sophia Serda has been involved in Carson River, maybe use her, and we have Ned Black for eco.

- **Further Sampling.** Dante to have Hill scope potential sampling in rest of drain, CBI would do sampling if ARC won't perform, need funding.

- **Other Components.** EPA to do strategy for peripheral components, rail spur, Weber Reservoir.

- **Peripheral Components.** ARC had not included in SAP but Jack said could add on, have someone recon, do an addendum to SAP, not connected to rail spur.

- **Rail Spur.** Hill to prepare SAP, offer to let ARC do sampling as scoped, if they refuse we can enforce order or do ourselves and bill them. Note Thompson Smelter is there too, rail spur not just used for Anaconda mine, area-wide usage, Arimetco had parcel there too.

- **Weber Reservoir.** Dante will have CBI review USGS report, ARC will have team ready to discuss. Cynthia shared Weber paper with Congressman, they offered to help.

OU8. Arimetco:

- **Public Meeting, Consultations.** Conducted public meeting on 12/12, WRPT Consultation 12/13, YPT on 12/14, EPA sent follow-up letters.

- RRRT.** Regional Remedy Review Team, reviews remedies between \$25-50M, conducted our review, held follow-up discussion with management, sent memo to EPA HQ, expect response this week. HQ will decide whether remedy warrants national RRT review. Dante follow-up. Jeryl -RRRT complete and ROD now in DC for HQ review. This should be complete 5/6, and Dave Davis has not heard anything yet. Dave –CR still undecided at this point.

- ROD/Response Summary.** Draft ROD reviewed by section chiefs, counsel, CI at EPA/NDEP/BLM, all changes incorporated, sent to BLM HQ, holding before sending to EPA HQ pending RRRT memo review by HQ. HQ BLM review 3/16-4/15; address/incorporate by 5/1. Anticipate 90d for routing/signature BLM/DOI routing, by 7/31.

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- Responsiveness Summary.** Added to ROD, same timing and path now.

- Enhanced Evaporation.** SPS pilot test, final report. McGinnis requested the EE pilot monthly reports, Dante will post on SP.

- Water Balance model.** Updates underway, Jack reported work in progress, incorporating dissolved solid data into model, stay tuned in coming weeks.

- Free Use Permit.** DD: NDEP application for borrow material, to be used as cover, outside site boundary but on BLM public land, requires EA/EIS. ARC started discussions with BLM on potentially buying the public land within mine property, handled at District office. No update.

ARC UAO Docket No. 9-2007-0005 (RI/FS site-wide)

Dante Rodriguez

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